

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK, JSC,

Plaintiffs,

-against-

FELIX SATER, DANIEL RIDLOFF, BAYROCK
GROUP INC., GLOBAL HABITAT SOLUTIONS,
INC., RRMI-DR LLC, FERRARI HOLDINGS LLC,
and MEM ENERGY PARTNERS LLC,

Defendants.

19 Civ. 2645 (JGK) (KHP)

**NOTICE OF MOTION FOR RECONSIDERATION OF THE COURT'S JUNE 1, 2022
ORDER**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Plaintiffs City of Almaty, Kazakhstan and BTA Bank JSC, by and through their attorneys Boies Schiller Flexner LLP, will move this Court before the Honorable John G. Koeltl, at the United States District Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at such date and time the Court sets, for an Order reconsidering its June 1, 2022 Order denying as moot Plaintiffs' motion to strike Defendant Felix Sater's Global Offer of Judgment (ECF No. 400), and granting the City of Almaty and BTA Bank other relief as the Court deems just and proper.

Dated: New York, New York
June 15, 2022

Respectfully,

/s/ Matthew L. Schwartz

Matthew L. Schwartz

Craig Wenner

Erica Sweeting

BOIES SCHILLER FLEXNER LLP

55 Hudson Yards

New York, New York 10001

Telephone: (212) 446-2300

Facsimile: (212) 446-2350

E-mail: mschwartz@bsflp.com